

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

*Alexandria Division*

UNITED STATES OF AMERICA

v.

ABDOUL KERIM AGBERE

*Defendant.*

Case No. 1:21-MJ-253

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Randy C. Combs, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”), and I have been so employed since 2010. I am currently assigned to a white-collar crime squad at the FBI’s Washington Field Office. During my employment with the FBI, I have conducted and/or assisted in many national security and criminal investigations, to include matters involving fraud against financial institutions, identity theft, money laundering, wire fraud, and other related federal violations of Title 18 of the United States Code. I have training and experience in the enforcement of the laws of the United States, including the preparation and presentation of affidavits in support of arrest warrants.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant based on probable cause to believe that ABDOUL KERIM AGBERE (“AGBERE”) did knowingly and intentionally commit: (1) attempted bank fraud in violation of Title 18, United States Code, Sections 1344 and 1349; and (2) aggravated identity theft in violation of Title 18, United States Code, Section 1028A (collectively, the “Subject Offenses”).

3. The facts in this affidavit come from my personal knowledge, my training and

experience, a review of documents, and information obtained from other individuals, including law enforcement personnel. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and warrant. It does not set forth all of my knowledge, or the knowledge of others, about this matter.

## **PROBABLE CAUSE**

### ***A. Summary of Investigation***

4. Beginning in or about December 2020, the Fairfax County Police Department (“FCPD”) initiated an investigation into a scheme whereby AGBERE and others obtained the personal identification information (“PII”) of unsuspecting victims and used that information to acquire false identifications for the purpose of fraudulently obtaining high-end vehicles and fraudulently renting high-end apartments.

5. Due to the scope of the alleged criminal activity, in or about December 2020, the FCPD notified the FBI of its ongoing investigation. Since in or about January 2021, the FBI has been working this investigation jointly with the FCPD.

6. Based on information developed by the FCPD and the FBI, your affiant believes there is probable cause that AGBERE has knowingly participated in the commission of the Subject Offenses within the Eastern District of Virginia.

### ***B. AGBERE Fraudulently Obtains a 2017 Cadillac Escalade***

7. On or about November 2, 2020, an individual later identified as AGBERE fraudulently represented himself as victim D.D. (“Victim-1”) and completed the necessary paperwork to obtain a 2017 Cadillac Escalade from Dealership-1 located in Manassas, Virginia (the “November 2020 Transaction”). Records provided to the FBI by Dealership-1 showed that a Dealership-1 credit application and buyer’s order, among other documents, were completed in

Victim-1's name. Through this investigation, your affiant has learned that Victim-1 is an actual person who does not know AGBERE. Furthermore, Victim-1 has confirmed that AGBERE did not have authorization from Victim-1 to use Victim-1's identity to obtain the 2017 Cadillac Escalade from Dealership-1.

8. Dealership-1 provided the FBI with a Dealertrack<sup>1</sup> form showing a finance request to PNC Bank in Victim-1's name for the 2017 Cadillac Escalade. The Dealertrack form showed the finance request to PNC Bank was approved with a financing amount of approximately \$55,400 and a term of seventy-two (72) months.<sup>2</sup>

9. Additional information provided to the FBI by Dealership-1 showed multiple documents completed in Victim-1's name, listing an address of 208 Poplar Spring Road, Potomac, Maryland, and a phone number ending in 2355. Through this investigation, your affiant has learned the true Victim-1 has never lived in Maryland, nor does the true Victim-1's phone number end in 2355. However, according to public records, AGBERE was associated with the Potomac, Maryland address as recently as 2016.

10. To obtain the 2017 Cadillac Escalade at Dealership-1, AGBERE fraudulently represented himself as Victim-1 and presented a California driver's license in the name of Victim-1. The California driver's license bore a photograph of an African American male.

11. Through this investigation, the FBI has learned that the California driver's license used during the November 2020 Transaction was fraudulent, as the true Victim-1 is not African

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<sup>1</sup>dealertrack.com/public/about\_dealertrack.asp states "With over 24,000 dealers and over 90 financing sources currently connected, DealerTrack is North America's premier independent Web-based platform that automates and accelerates the entire automotive financing process."

<sup>2</sup> PNC Bank provides a range of traditional banking services throughout the United States, including in the Eastern District of Virginia, and its deposits are insured under the Federal Deposit Insurance Act, and is therefore a financial institution within the scope of Title 18, United States Code, Sections 20 and 1344.

American but is Caucasian. Based on information obtained from the Maryland Motor Vehicle Administration database, law enforcement knows that AGBERE is an African American male.

12. Additionally, the California driver's license used during the transaction of the 2017 Cadillac Escalade at Dealership-1 contained a driver's license number ending in 2231. Through this investigation, your affiant has learned the true Victim-1 driver's license number does not end in 2231.

13. On or about March 5, 2021, the FBI conducted an interview of a Dealership-1 employee ("Employee-1"), who was the finance manager for Dealership-1 during the November 2020 Transaction. Employee-1 recalled and described the individual portraying Victim-1 as a black male with a dark complexion, approximately 5'11 in height, approximately 145 to 155 pounds, and having the appearance of being between twenty-five (25) and twenty-nine (29) years in age. Employee-1 stated the individual portraying Victim-1 had an accent but spoke English well. Law enforcement compared this description to the height, weight, and age listed for AGBERE in the National Crime Information Center database. The description provided by Employee-1 matches the race, weight range, and age of AGBERE.

14. During the transaction involving the 2017 Cadillac Escalade, AGBERE—portraying Victim-1—stated he previously lived in California and was an instructor for teachers at colleges and alternative schools. AGBERE provided proof of insurance in Victim-1's name and Victim-1's employment information. Dealership-1 contacted Victim-1's place of employment to verify Victim-1's name and work phone extension. Based on the information AGBERE provided, Dealership-1 let AGBERE leave with the 2017 Cadillac Escalade.

15. AGBERE's fraudulent driver's license in Victim-1's name purported to be issued by the state of California but AGBERE claimed to live in the local area, prompting a red flag in

Dealership-1's system. Because of this, Employee-1 contacted AGBERE the next day to inform him that proof of residency was required. AGBERE never provided proof of residency.

16. Employee-1 then pulled an Experian report on Victim-1, prompting a phone call from the real Victim-1. Victim-1 stated his identity had been stolen and provided the same residential address, work address, and job title that AGBERE used during the November 2020 Transaction. The contract for the vehicle with PNC bank was stopped due to the conflicting information. However, AGBERE remained in possession of the vehicle.

### ***C. Law Enforcement Discovers AGBERE's Identity.***

#### **i. AGBERE's arrest**

17. On or about December 10, 2020, the FCPD was contacted by another car dealership located in Fairfax, Virginia ("Dealership-2") regarding an in-progress, fraudulent vehicle purchase. Dealership-2 reported that a person later identified as AGBERE was attempting to finance the purchase of a 2015 Mercedes S550 with a fraudulent Maryland driver's license in the name of M.F. ("Victim-2").<sup>3</sup> Law enforcement determined the driver's license in Victim-2's name was fraudulent because law enforcement ran the license number and it returned as not valid through the Maryland Motor Vehicle Administration.

18. After determining the Maryland driver's license that was being used during the purchase at Dealership-2 was fraudulent, the FCPD arrested the individual attempting to purchase the vehicle. Law enforcement determined this person was AGBERE because he had debit cards in AGBERE's name, as well as the return of positive fingerprint results. FCPD also found Employee-1's business card in AGBERE's possession.

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<sup>3</sup> AGBERE attempted to finance the purchase through Old Point National Bank. Old Point National Bank provides a range of traditional banking services throughout the United States, including in the Eastern District of Virginia, and its deposits are insured under the Federal Deposit Insurance Act, and is therefore a financial institution within the scope of Title 18, United States Code, Sections 20 and 1344.

**ii. AGBERE's fraudulently rented apartment**

19. On or about December 19, 2020, the FCPD learned AGBERE was using a separate victim's information to fraudulently rent an apartment in Tysons, Virginia which is located within the Eastern District of Virginia, for which AGBERE owed more than \$40,000 in past due rent and damages. On or about December 21, 2020, the FCPD executed a search warrant, authorized by a Fairfax County Magistrate on AGBERE's fraudulently rented apartment.

20. AGBERE was not present in the apartment at the time of the execution of the search warrant; however, multiple documents in AGBERE's name were located during the search. Additionally, the 2017 Cadillac Escalade involved in the November 2020 transaction which had been reported stolen in the National Crime Information Center system was identified at the apartment complex. The owner of the 2017 Cadillac Escalade, Dealership-1, was notified by FCPD that the vehicle had been recovered.

21. A search of the stolen 2017 Cadillac Escalade was conducted by the FCPD. Items identified during the search included an envelope addressed to AGBERE from the District Court of Maryland and a Maryland vehicle emission inspection document in AGBERE's name for a separate vehicle.

**iii. AGBERE's iPhone**

22. As a result of AGBERE's December 10, 2020 arrest at Dealership-2, AGBERE's iPhone was seized and later searched pursuant to a search warrant issued by a Fairfax County Magistrate. Information extracted from AGBERE's iPhone by the FCPD was provided to the FBI.

23. An FBI review of AGBERE's iPhone revealed information related to Victim-1.

For example, on or about September 27, 2020, AGBERE received a text message through a secure messaging application from an individual with a Ghanaian country code phone number. The text message contained the PII of Victim-1, to include full name, date of birth, social security number, residential address, email address with password, credit score, and place of employment. Additionally, on or about November 9, 2020, AGBERE again communicated with the Ghanaian country code phone number through secure text message and asked the individual to unfreeze Victim-1's credit.

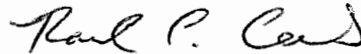
24. On or about October 17, 2020, AGBERE sent or received a photograph of the fraudulent California driver's license in Victim-1's name that was used during the November 2020 Transaction. Furthermore, AGBERE's iPhone contained multiple photographs of a Cadillac Escalade with a Dealership-1 license plate holder from dates following the November 2020 Transaction.

\* \* \*

**CONCLUSION**

25. Based on my training and experience, and the information provided in this affidavit, your affiant submits that there is probable cause to believe that ABDOUL KERIM AGBERE, within the Eastern District of Virginia, did knowingly and intentionally commit: (1) attempted bank fraud in violation Title 18, United States Code, Sections 1344 and 1349; and (2) aggravated identity theft in violation of Title 18, United States Code, Section 1028A. I respectfully request that a warrant be issued for his arrest.

Respectfully Submitted,



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Randy C. Combs  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me in  
accordance with the requirements of Fed.  
Crim. R. P. 4.1. via telephone on this \_\_\_\_\_  
day of July 2021.

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Honorable Theresa C. Buchanan  
United States Magistrate Judge